

Exhibit D

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**THE BAUER PLAINTIFFS’
FIRST REQUEST TO PRODUCE DOCUMENTS AND THINGS
(Nos. 1-15)**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and the Local Rules of this Court, plaintiffs Dr. Alan J. Bauer, Revital Bauer, Yehonathon Bauer, Binyamin Bauer, Daniel Bauer and Yehuda Bauer (“Plaintiffs”), by counsel, request that Defendants the Palestinian Authority and the Palestine Liberation Organization produce the documents and things described below to Plaintiffs’ counsel within 30 days of the service of these requests.

INSTRUCTIONS AND GENERAL DEFINITIONS

1. Defendants shall respond to these requests as required by the Federal Rules of Civil Procedure and the Local Rules of this Court.
2. The definitions and rules of construction set forth in the Federal Rules of Civil Procedure and the Local Rules of this Court are incorporated by reference herein and govern these requests.

SPECIFIC DEFINITIONS

1. “PA” means and refers to defendant The Palestinian Authority and any ministry, agency, division, bureau, department or instrumentality thereof.

2. “PLO” means and refers to defendant The Palestine Liberation Organization and any agency, division, bureau, department or instrumentality thereof.

3. “Defendants” means and refers collectively to Defendants PA and PLO and any ministry, agency, division, bureau, department or instrumentality thereof.

REQUESTS FOR DOCUMENTS AND THINGS

1. All documents concerning all requests made to the PA between September 1, 2000 and March 21, 2002, by any person or entity, to question, detain or arrest Nasser Shawish.

2. All documents concerning the causes of and/or the reasons for all custodial questioning, arrests and/or detentions of Nasser Shawish by the PA at any time between September 1, 2000 and March 21, 2002.

3. All documents concerning all custodial questioning, arrests and/or detentions of Nasser Shawish by the PA at any time between September 1, 2000 and March 21, 2002, including without limitation all documents concerning the details and circumstances of such custodial questioning, arrests and/or detentions, and all documents concerning the substance of the questions asked and the responses given during such custodial questioning.

4. All documents concerning Nasser Shawish’s release(s) from PA custody at any time between September 1, 2000 and March 21, 2002, including without limitation all documents concerning the circumstances of, causes of, and/or reasons for such release(s).

5. If Defendants contend that Nasser Shawish escaped from PA custody at any time between September 1, 2000 and March 21, 2002 – all documents concerning any such purported escape(s), including without limitation all documents concerning the circumstances and/or causes of such purported escape(s).

6. All documents concerning all requests made to the PA between September 1, 2000 and March 21, 2002, by any person or entity, to question, detain or arrest Abdel Karim Aweis.

7. All documents concerning the causes of and/or the reasons for all custodial questioning, arrests and/or detentions of Abdel Karim Aweis by the PA at any time between September 1, 2000 and March 21, 2002.

8. All documents concerning all custodial questioning, arrests and/or detentions of Abdel Karim Aweis by the PA at any time between September 1, 2000 and March 21, 2002, including without limitation all documents concerning the details and circumstances of such custodial questioning, arrests and/or detentions, and all documents concerning the substance of the questions asked and the responses given during such custodial questioning.

9. All documents concerning Abdel Karim Aweis' release(s) from PA custody at any time between September 1, 2000 and March 21, 2002, including without limitation all documents concerning the circumstances of, causes of, and/or reasons for such release(s).

10. If Defendants contend that Abdel Karim Aweis escaped from PA custody at any time between September 1, 2000 and March 21, 2002 – all documents concerning any such purported escape(s), including without limitation all documents concerning the circumstances and/or causes of such purported escape(s).

11. All documents concerning all requests made to the PA between September 1, 2000 and March 21, 2002, by any person or entity, to question, detain or arrest Mohammed Hashaika.

12. All documents concerning the causes of and/or the reasons for all custodial questioning, arrests and/or detentions of Mohammed Hashaika by the PA at any time between September 1, 2000 and March 21, 2002.

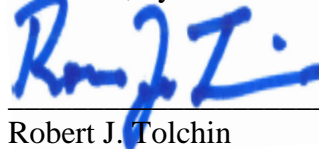
13. All documents concerning all custodial questioning, arrests and/or detentions of Mohammed Hashaika by the PA at any time between September 1, 2000 and March 21, 2002, including without limitation all documents concerning the details and circumstances of such custodial questioning, arrests and/or detentions, and all documents concerning the substance of the questions asked and the responses given during such custodial questioning.

14. All documents concerning Mohammed Hashaika's release(s) from PA custody at any time between September 1, 2000 and March 21, 2002, including without limitation all documents concerning the circumstances of, causes of, and/or reasons for such release(s).

15. If Defendants contend that Mohammed Hashaika escaped from PA custody at any time between September 1, 2000 and March 21, 2002 – all documents concerning any such purported escape(s), including without limitation all documents concerning the circumstances and/or causes of such purported escape(s).

March 23, 2012

Plaintiffs, by their Attorney,



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CERTIFICATION

I hereby certify that on March 23, 2012, I caused the within to be served by electronic mail and by hand on the counsel listed below:

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Robert J. Tolchin